N.C. DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES

Circle one:
G, (I), P, GW, C

FILE DOCKET

	DATE	ITEM
(1)	10.12.90	Permit Application (Part A) & Photos
(2)	5.28.92	To: J. Rhodes fr: Yvonne Bailey Re: Soil Assmt Report
(3)	1-28-95	Permit Application part A.
(4)	1-31-95	Amended RCRA part A permit Application

G- General, I- Inspections
P- Permits, GW- Ground Water
C- Closure

DHS (7/85)
SOLID & HAZARDOUS WASTE MANAGEMENT BRANCH (Review 6/90)

File; Permitting
Asheville Dyeing + Fin.
NCD 070 619 663

(4)

KIRKLAND & ELLIS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

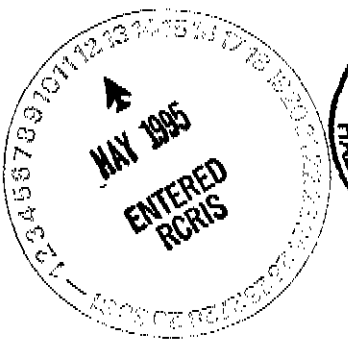
655 Fifteenth Street, N.W.
Washington, D.C. 20005

202 879-5000

Brian R. Land
To Call Writer Direct:
202 879-5956

Facsimile:
202 879-5200

January 31, 1995



VIA FEDERAL EXPRESS

Mr. James Edwards
Hazardous Waste Section
North Carolina Department of Environment
Health and Natural Resources
401 Oberlin Road
Raleigh, N.C. 27605

Re: Amended RCRA Part A Permit Application - Asheville Dyeing and Finishing, Swannonoa, North Carolina - NCD070619663

Dear Mr. Edwards:

Our client, Anvil Knitwear, Inc. (the "Company"), has purchased certain assets of the Anvil Knitwear Division of McGregor Corporation and Winston Mills, Inc. The transaction closed on January 28, 1995. As part of the transaction, the Company acquired the Asheville Dyeing and Finishing facility located on Warren Wilson College Road, Swannanoa, North Carolina 28778.

The above-referenced facility is the subject of corrective action pursuant to RCRA. Pursuant to the terms of the sale, Winston Mills, Inc. (the Seller) will retain responsibility for the RCRA corrective action. I have discussed these circumstances with you and you indicated that the parties should submit an amended Part A application listing Anvil Knitwear, Inc. as the new owner of the facility, and listing Winston Mills, Inc. as the operator. Such an amended Part A application is enclosed. Other than the change in owner, the application is virtually identical to the application submitted by Winston Mills, Inc. in 1990.

The transaction will not affect the day-to-day operations of the facility. Moreover, we have been assured that Winston Mills, Inc. will continue to fulfill its requirements under RCRA.

I appreciate your attention to this matter. If you require any additional information, please call me at (202) 879-5956.

Sincerely,

Brian R. Land
Counsel to Anvil Knitwear, Inc.

Enclosure

cc: Steve Oster, Esq.
Jack Hollander
Steve Pegg
Yvonne Bailey, Esq.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

For EPA Regional Use Only

Date Received
Month Day Year

EPA
United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

RECEIVED
FEB 1 1995
HAZARDOUS WASTE

(3)

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. First Part A Submission

[X] B. Part A Amendment #

C. Installation's EPA ID Number	D. Secondary ID Number *(If applicable)*
NCD070619663	

II. Name of Facility

ASHEVILLE DYEING & FINISHING

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

WARREN WILSON COLLEGE ROAD

Street *(Continued)*

(NO STREET NUMBER)

City or Town	State	Zip Code
SWANNANOA	NC	28778

County Code *(If known)*	County Name
021	BUNCOMBE

B. Land Type (Enter code)	C. Geographic Location		D. Facility Existence Date
	LATITUDE *(Degrees, Minutes, & Seconds)*	LONGITUDE *(Degrees, Minutes & Seconds)*	Month Day Year
P	353643	0822556	*

IV. Facility Mailing Address

Street or P.O. Box

PO BOX 337

City or Town	State	Zip Code
SWANNANOA	NC	28778

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(Last)*	*(First)*
PEGG	STEVE

Job Title	Phone Number *(Area Code and Number)*
DIR. EMP. RELATNS.	704-298-2280

VI. Facility Contact Address *(See Instructions)*

A. Contact Address Location [ ] Mailing [ ] Other [X]

B. Street or P.O. Box

PO BOX 337

City or Town	State	Zip Code
SWANNANOA	NC	28778

* SEE ATTACHMENT

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Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
NCD070619663	

VII. Operator Information (See Instructions)

Name of Operator

WINSTON MILLS, INC. c/o MCGREGOR CP.

Street or P.O. Box

600 MADISON AVE. 11th FLOOR

City or Town	State	ZIP Code
NEW YORK	NY	10022 —

Phone Number (Area Code and Number)	B. Operator Type	C. Change of Operator Indicator	Date Changed Month Day Year
212 — 307 — 8110	P	Yes [ ] No [X]	

VIII. Facility Owner (See Instructions)

A. Name of Facility's Legal Owner

ANVIL KNITWEAR, INC.

Street or P.O. Box

PO BOX 337

City or Town	State	ZIP Code
SWANNANOA	NC	28778 —

Phone Number (Area Code and Number)	B. Owner Type	C. Change of Owner Indicator	Date Changed Month Day Year
704 — 298 — 2280	P	Yes [X] No [ ]	01 28 95

IX. SIC Codes (4-digit, in order of significance)

Primary	Secondary
2269 (Description) FINISHERS OF TEXTILES	(Description)
Secondary	**Secondary**
(Description)	(Description)

X. Other Environmental Permits (See Instructions)

A. Permit Type (Enter code)	B. Permit Number	C. Description
E	S - 021 - 91	DISCHARGE TO METROPOLITAN SEWARAGE
		DISTRICT OF BUNCOMBE COUNTY
E	20180 & 20181	WESTERN N. CAROLINA REGIONAL AIR
		POLLUTION CONTROL PERMITS TO OPERATE
E	L085	BUNCOMBE COUNTY HAZARDOUS WASTE
		LICENSE

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Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number (Enter from page 1)												Second ID Number (Enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XI. Nature of Business (Provide a brief description)

The facility is a manufacturing facility which knits, dyes, and finishes fabrics for the screen print industry. The facility produces cotton and poly-cotton circular knit fabrics.

XII. Process Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.
1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet or Hectare-meter
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day r Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons or Liters
S05	Drip Pad	Gallons or Liters
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	I

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Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)							B. PROCESS DESIGN CAPACITY 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	For Official Use Only					
X	1	S	0	2	5	3	3	7	8	8	.	G	0 0 1						
	1	D	8	0	0.05*							A	0 0 1						
	2																		
	3																		
	4																		
	5																		
	6																		
	7																		
	8																		
	9																		
1	0																		
1	1																		
1	2																		
1	3																		

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seq w/XII)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. PROCESS DESIGN CAPACITY 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	D. Description Of Process
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

*SEE ATTACHMENT

EPA I.D. Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of item XIV-D(1).*
3. *Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter code)	D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

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GSA No. 0248-EPA-OT

EPA I.D. Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XIV. Description of Hazardous Wastes (Continued)

Line Number		A. EPA HAZARDOUS WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
	1	F	0	0	1	< 100*	K	D	8	0							
	2																
	3																
	4																
	5																
	6																
	7																
	8																
	9																
1	0																
1	1																
1	2																
1	3																
1	4																
1	5																
1	6																
1	7																
1	8																
1	9																
2	0																
2	1																
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2	3																
2	4																
2	5																
2	6																
2	7																
2	8																
2	9																
3	0																
3	1																
3	2																
3	3																

*SEE ATTACHMENT

EPA I.D. Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

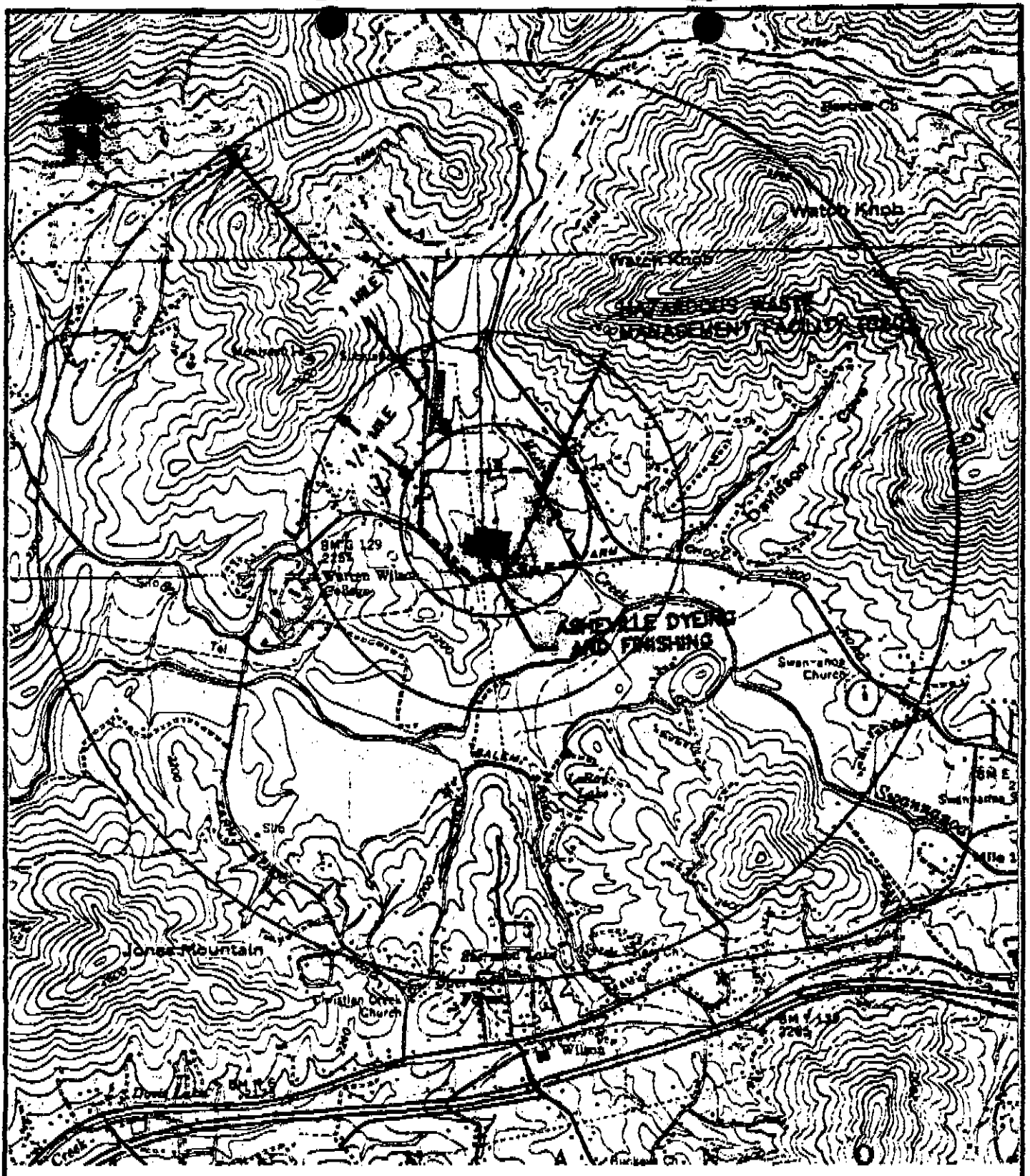
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature: Daniel W Miller V.P.	Date Signed: 1/30/95
Name and Official Title (Type or print): Daniel W. Miller, Vice President	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature: Jacob Hollander	Date Signed: 1/27/95
Name and Official Title (Type or print): JACOB HOLLANDER VICE PRES	
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

MAY 1995
ENTERED
RCRIS

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)



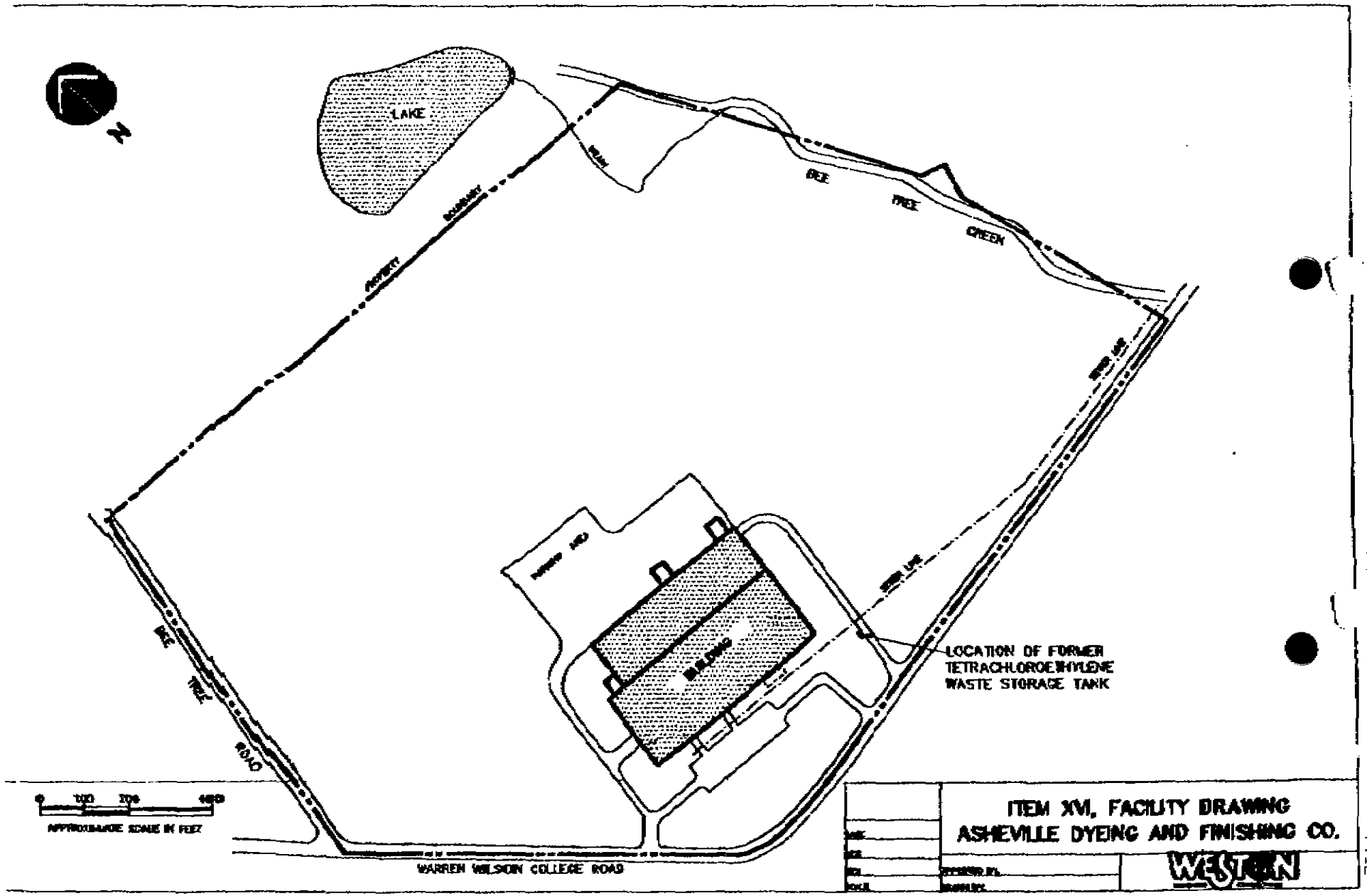
SOURCE: USGS OTEEN, NC (201–SW) AND CRAGGY PINNACLE, NC (201–NW) SCALE: 1"=2000'

PL = PROPERTY LINE

SITE LOCATION N 82° 25' 56"
W 35° 36' 44"

ITEM XV. MAP

WESTON


N
LAKE
RAILROAD
CREEK
BUILDING
LOCATION OF FORMER
TETRACHLOROETHYLENE
WASTE STORAGE TANK
WARREN WILSON COLLEGE ROAD
APPROXIMATE SCALE IN FEET
ITEM XVI, FACILITY DRAWING
ASHEVILLE DYEING AND FINISHING CO.
WESTON

ITEM XVII. PHOTOGRAPHS

SITE OF FORMER UNDERGROUND STORAGE TANK #11
(D80 LANDFILL)
28 JUNE 1990

EPA ID No. NCD070619663

Amended Part A Application
Asheville Dyeing & Finishing
Swannanoa, North Carolina
January 26, 1994

ATTACHMENT

ITEM III.D. FACILITY EXISTENCE DATA

Current hazardous waste compliance activities for the facility, including this amended Part A application, are a result of the Administrative Order on Consent entered between Winston Mills, Inc. and the North Carolina Department of Environment, Health, and Natural Resources on 29 August 1990. The date of commencement of hazardous waste operations at the facility, as requested in Item III.D. of the Part A application, does not readily apply to this specific hazardous waste compliance activity. The following passage from the "Stipulations and Findings of Fact," as contained in the Administrative Order or Consent, more accurately depicts the date of hazardous waste activity at the facility:

> "The Hazardous Waste Section allows that prior to April 1985, as part of a dry cleaning process at the site, the prior owner/operator of the Asheville Dyeing & Finishing site utilized a raw material underground storage tank and a hazardous waste underground storage tank, both for the storage of tetrachloroethylene. In April 1985, the tanks were removed. Soil samples were collected from the bottom of the tank pits and analyzed by Environmental Testing, Inc. for the presence of solvents. Sample analysis results indicated detectable levels of 1,1,2-trichloroethylene in the soil beneath the tanks. In addition, approximately 14 years ago, an alleged spill of solvent by the previous owner/operator, consisting primarily of tetrachloroethylene occurred at the facility and it is believed that some of the solvent entered an 8-inch drain pipe and followed this pipe to Bee Tree Creek, approximately 1100 feet east of the plant building. Most of the solvent reportedly entered the ground. In 1988, Westinghouse Environmental Services collected soil samples from the site. The samples were analyzed by Industrial and Environmental Analysis, Inc. for volatile organics. Three hazardous constituents were reported in the results: acetone, methylene chloride, and tetrachloroethylene. From the alleged actions of the previous owner/operator, the trichloroethylene, tetrachloroethylene, and methylene chloride contamination in soils at the site constitutes either the disposal of listed hazardous wastes (F001, F003) or the presence of hazardous constituents, as defined in 40 CFR 260.10, codified at 10 NCAC 10F.0002 and 40 CFR 261, codified at 10 NCAC 10F.0029. For the purpose of this order, the Waste Management Unit (the Unit) is the hazardous waste underground storage tank described above. The facility neither admits nor denies any of the allegations set out in this paragraph."

EPA ID No. NCD070619663

Amended Part A Application
Asheville Dyeing & Finishing
Swannanoa, North Carolina
January 26, 1994

This amended Part A application, as filed herein, addresses the underground storage tank pit area where waste tetrachloroethylene was formerly stored.

ITEM XII. PROCESS CODES AND DESIGN CAPABILITIES

Volume of D80 landfill based on estimated dimensions of former underground storage tank pit of 10 ft. x 20 ft. x 10 ft. deep.

ITEM XIV. DESCRIPTION OF HAZARDOUS WASTES

Estimated quantity of waste based on assumption of maximum 1,1,2-trichloroethylene concentration in soil of 1 mg/kg over a 10 ft. x 20 ft. x 1 ft. deep area (i.e. soil immediately underlying previous underground storage tank). This waste represents leakage or spillage associated with operation of an underground storage tank taken out of service in March 1985. The estimated quantity is a conservative, cumulative total of trichloroethylene potentially present in subsurface soils. No additional trichloroethylene wastes are being or will be generated.

ITEM XV. MAP

According to "Geology and Groundwater Resources of the Asheville Area, North Carolina" (Trapp, 1970), four privately-owned wells are located within the immediate vicinity of the facility. Two of these wells are reported to be observation wells; use of the remaining two wells is not identified. However, none of the wells are located within 1/4-mile of the facility. The C.D. Owens Company, located within 1/4-mile of the facility, owns and operates several wells on its property; however, these wells are reportedly used for industrial purposes.

FILE: P
ASHEVILLE DYE
NCD 070 619 663

WOMBLE CARLYLE SANDRIDGE & RICE
800 WACHOVIA BUILDING
RALEIGH, NORTH CAROLINA 27601

CHARLOTTE OFFICE
3300 ONE FIRST UNION CENTER
301 SOUTH COLLEGE STREET
CHARLOTTE, NC 28202-6025
TELEPHONE (704) 331-4900
TELECOPY (704) 331-4955

MAILING ADDRESS
POST OFFICE BOX 831
RALEIGH, NORTH CAROLINA 27602
TELEPHONE (919) 755-2100
TELECOPY (919) 755-2150
TELEX 806498

WINSTON-SALEM OFFICES
1600 ONE TRIAD PARK
AND
2400 WACHOVIA BUILDING
POST OFFICE DRAWER 84
WINSTON-SALEM, NC 27102
TELEPHONE (919) 721-3600
OTP TELECOPY (919) 721-3660
WACHOVIA TELECOPY (919) 721-3597
TELEX 806498

YVONNE C. BAILEY
(919) 755-2129

MAY 29 1992

May 28, 1992

Mr. Jerome H. Rhodes
Chief, Hazardous Waste Section
Division of Solid Waste Management
Department of Environment, Health,
and Natural Resources
Post Office Box 27687
401 Oberlin Road
Raleigh, NC 27611-7687

Re: Asheville Dyeing and Finishing Facility
Swannanoa, North Carolina

Dear Jerry:

Enclosed is a Soil Assessment Report dated May 22, 1992, prepared by Aquaterra, Inc., in connection with the above-referenced facility. As we discussed with you and your staff, AD&F is proposing to put in a wastewater pre-treatment system at its Swannanoa facility as required by the Metropolitan Sewage District in Asheville, North Carolina. Although the pre-treatment facility will not be constructed in the area where the former waste underground storage tank is located, AD&F requested Aquaterra to sample the area to insure that tetrachloroethene (PCE), or other volatile organic compounds, had not impacted the area. As you can see from the enclosed, analytical data indicates the presence of volatile organic compounds just above analytical detection methods at only one location in the study area. As evidenced by analytical data collected from monitoring wells MW-9 and MW-9d, groundwater has not been impacted in the area.

If you have any comments about this report, do not hesitate to contact me.

Truly yours,

Yvonne C. Bailey

YCB/vlt

cc: Jacob Hollander, Esq. (w/enclosure)
Steve Pegg (w/enclosure)
R. Howard Grubbs, Esq. (w/o enclosure)
James A. Carpenter (w/o enclosure)
Bob Glaser (w/o enclosure)
Rob McDaniel (w/o enclosure)
Spring Allen (w/o enclosure)
Kirk Pollard (w/o enclosure)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

For EPA Regional Use Only

Date Received
Month Day Year

EPA
United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

For State Use Only

1

RECEIVED
OCT 15 1990
HAZARDOUS WASTE SECTION

I. ID Number(s)

A. EPA ID Number	B. Secondary ID Number *(if applicable)*
NCD070619663	

II. Name of Facility

ASHEVILLE DYEING & FINISHING

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

WARREN WILSON COLLEGE ROAD

Street *(continued)*

(NO STREET NUMBER)

City or Town	State	ZIP Code
SWANNANOA	NC	28778-

County Code *(if known)*	County Name
	BUNCOMBE

B. Land Type *(enter code)*	C. Geographic Location		D. Facility Existence Date
	LATITUDE (degrees, minutes, & seconds)	*LONGITUDE (degrees, minutes, & seconds)*	Month Day Year
P	35 36 43.7	082 25 55.6	*

IV. Facility Mailing Address

Street or P.O. Box

PO BOX 337

City or Town	State	ZIP Code
SWANNANOA	NC	28778-

RECEIVED
JUN 4 1992
DATA PROCESSING

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)*	*(first)*
PEGG	STEVE

Job Title	Phone Number *(area code and number)*
*	- -

VI. Facility Contact Address *(See Instructions)*

A. Contact Address Location	A. Contact Address Mailing	B. Street or P.O. Box
	X	PO BOX 337

City or Town	State	ZIP Code
SWANNANOA	NC	28778-

* SEE ATTACHMENT

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GSA No. 0246-EPA-OT

EPA I.D. Number *(enter from page 1)*: NCD070619663

Secondary ID Number *(enter from page 1)*:

VII. Operator Information *(see Instructions)*

Name of Operator: WINSTON MILLS INC

Street or P.O. Box: PO BOX 337

City or Town: SWANNANOA

State: NC

ZIP Code: 28778-

Phone Number *(area code and number)*: 704-298-2280

B. Operator Type: P

C. Change of Operator Indicator: Yes ☐ No ☐

Date Changed Month Day Year:

VIII. Facility Owner *(see Instructions)*

A. Name of Facility's Legal Owner: WINSTON MILLS INC

Street or P.O. Box: PO BOX 337

City or Town: SWANNANOA

State: NC

ZIP Code: 28778-

Phone Number *(area code and number)*: 704-298-2280

B. Owner Type: P

C. Change of Owner Indicator: Yes ☐ No ☐

Date Changed Month Day Year:

IX. SIC Codes *(4-digit, in order of significance)*

Primary	Secondary
2269 (description) FINISHERS OF TEXTILES	(description)
Secondary	**Secondary**
(description)	(description)

X. Other Environmental Permits *(see Instructions)*

A. Permit Type (enter code)	B. Permit Number	C. Description
N	S-021-88	DISCHARGE TO METROPOLITAN SEWERAGE DISTRICT OF BUNCOMBE COUNTY

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Form Approved, OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1): N C D 0 7 0 6 1 9 6 6 3

Secondary ID Number (enter from page 1):

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY
X 1	S 0 2	600	G	0 0 2	
X 2	T 0 3	20	E	0 0 1	
1	D 8 0	0.05*	A	0 0 1	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in item XIII.

XIII. Additional Treatment Processes (follow instructions from item XII)

Line Number (enter numbers in sequence with item XII)	A. PROCESS CODE	B. TREATMENT PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. TREATMENT PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
	T 0 4				
	T 0 4				
	T 0 4				
	T 0 4				

*SEE ATTACHMENT

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Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XI. Nature of Business (provide a brief description)

Asheville Dyeing & Finishing (AD&F) is a manufacturing facility which knits, dyes, and finishes fabrics for the screen print industry. AD&F produces cotton and poly-cotton circular knit fabrics.

XII. Process Codes and Design Capacities

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.

B. PROCESS DESIGN CAPACITY – For each code entered in column A, enter the capacity of the process.

1. AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

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Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0248-EPA-OT

EPA I.D. Number (enter from page 1): N C D 0 7 0 6 1 9 6 6 3

Secondary ID Number (enter from page 1):

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F 0 0 1	<100*	K	D 8 0	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					

* SEE ATTACHMENT

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item XIV-D(1).*
3. *Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS (1) PROCESS CODES (enter)								D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0			
X	2	D	0	0	2	400	P	T	0	3	D	8	0			
X	3	D	0	0	1	100	P	T	0	3	D	8	0			
X	4	D	0	0	2											Included With Above

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Form Approved, OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)													
N	C	D	0	7	0	6	1	9	6	6	3														

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Owner Signature	Date Signed
William E. Rome	10-12-90

Name and Official Title *(type or print)*
William E. Rome, Vice President of Textiles

Operator Signature	Date Signed
William E. Rome	10-12-90

Name and Official Title *(type or print)*
William E. Rome, Vice President of Textiles

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to Instructions for more information)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-01

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
N	C	D	0	7	0	6	1	9	6	6	3												

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	Additional Process Codes (enter)																											

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

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Owner Signature	Date Signed
William E. Rome	10-12-90

Name and Official Title *(type or print)*
William E. Rome, Vice President of Textiles

Operator Signature	Date Signed
William E. Rome	10-12-90

Name and Official Title *(type or print)*
William E. Rome, Vice President of Textiles

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

ATTACHMENT

ITEM III.D. FACILITY EXISTENCE DATA

Current hazardous waste compliance activities for the Asheville Dyeing & Finishing facility, including this Part A application, are a result of the Administrative Order on Consent entered between Asheville Dyeing & Finishing and the North Carolina Department of Environment, Health, and Natural Resources on 29 August 1990. The date of commencement of hazardous waste operations at the facility, as requested in Item III.D. of the Part A application, does not readily apply to this specific hazardous waste compliance activity. The following passage from the "Stipulations and Findings of Fact," as contained in the Administrative Order on Consent, more accurately depicts the date of hazardous waste activity at the facility:

> "The Hazardous Waste Section alleges that prior to April 1985, as part of a dry cleaning process at the site, the prior owner/operator of the Asheville Dyeing & Finishing site utilized a raw material underground storage tank and a hazardous waste underground storage tank, both for the storage of tetrachloroethylene. In April 1985, the tanks were removed. Soil samples were collected from the bottom of the tank pits and analyzed by Environmental Testing, Inc. for the presence of solvents. Sample analysis results indicated detectable levels of 1,1,2-trichloroethylene in the soil beneath the tanks. In addition, approximately 14 years ago, an alleged spill of solvent by the previous owner/operator, consisting primarily of tetrachloroethylene occurred at Asheville Dyeing & Finishing's site and it is believed that some of the solvent entered an 8-inch drain pipe and followed this pipe to Bee Tree Creek, approximately 1100 feet east of the plant building. Most of the solvent reportedly entered the ground. In 1988, Westinghouse Environmental Services collected soil samples from the site. The samples were analyzed by Industrial and Environmental Analysts, Inc. for volatile organics. Three hazardous constituents were reported in the results: acetone, methylene chloride, and tetrachloroethylene. From the alleged actions of the previous owner/operator, the trichloroethylene, tetrachloroethylene, and methylene chloride contamination in soils at the site constitutes either the disposal of listed hazardous wastes (F001, F003) or the presence of hazardous constituents, as defined in 40 CFR 260.10, codified at 10 NCAC 10F.0002 and 40 CFR 261, codified at 10 NCAC 10F.0029. For the purpose of this order, the Waste Management Unit (the Unit) is the hazardous waste underground storage tank described above. Asheville Dyeing & Finishing neither admits nor denies any of the allegations set out in this paragraph."

This Part A application, as filed herein, addresses only the underground storage tank pit area where waste tetrachloroethylene was formerly stored.

ITEM V. FACILITY CONTACT

Director, Employee Relations

ITEM XII. PROCESS CODES AND DESIGN CAPABILITIES

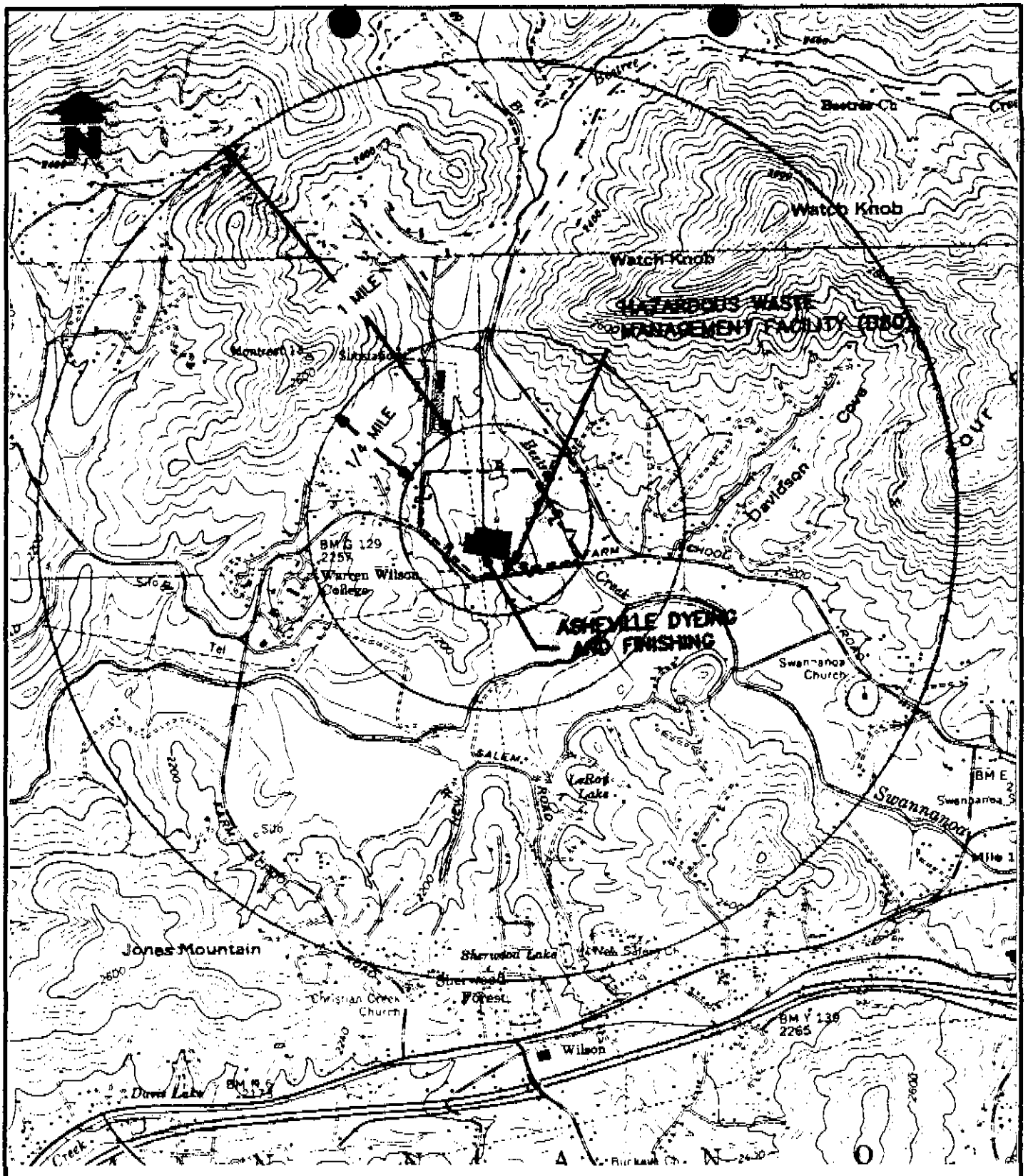
Volume of D80 landfill based on estimated dimensions of former underground storage tank pit of 10 ft. x 20 ft. x 10 ft. deep.

ITEM XIV. DESCRIPTION OF HAZARDOUS WASTES

Estimated quantity of waste based on assumption of maximum 1,1,2-trichloroethylene concentration in soil of 1 mg/kg over a 10 ft. x 20 ft. x 1 ft. deep area (i.e., soil immediately underlying previous underground storage tank). This waste represents leakage or spillage associated with operation of an underground storage tank taken out of service in March 1985. The estimated quantity is a conservative, cumulative total of trichloroethylene potentially present in subsurface soils. No additional trichloroethylene wastes are being or will be generated.

ITEM XV. MAP

According to "Geology and Groundwater Resources of the Asheville Area, North Carolina" (Trapp, 1970), four privately-owned wells are located within the immediate vicinity of the facility. Two of these wells are reported to be observation wells; use of the remaining two wells is not identified. However, none of the wells are located within 1/4-mile of the Asheville Dyeing & Finishing facility. The C.D. Owens Company, located within 1/4-mile of the facility, owns and operates several wells on its property; however, these wells are reportedly used for industrial purposes.



SOURCE: USGS OTEEN, NC (201–SW) AND CRAGGY PINNACLE, NC (201–NW) SCALE: 1"=2000'

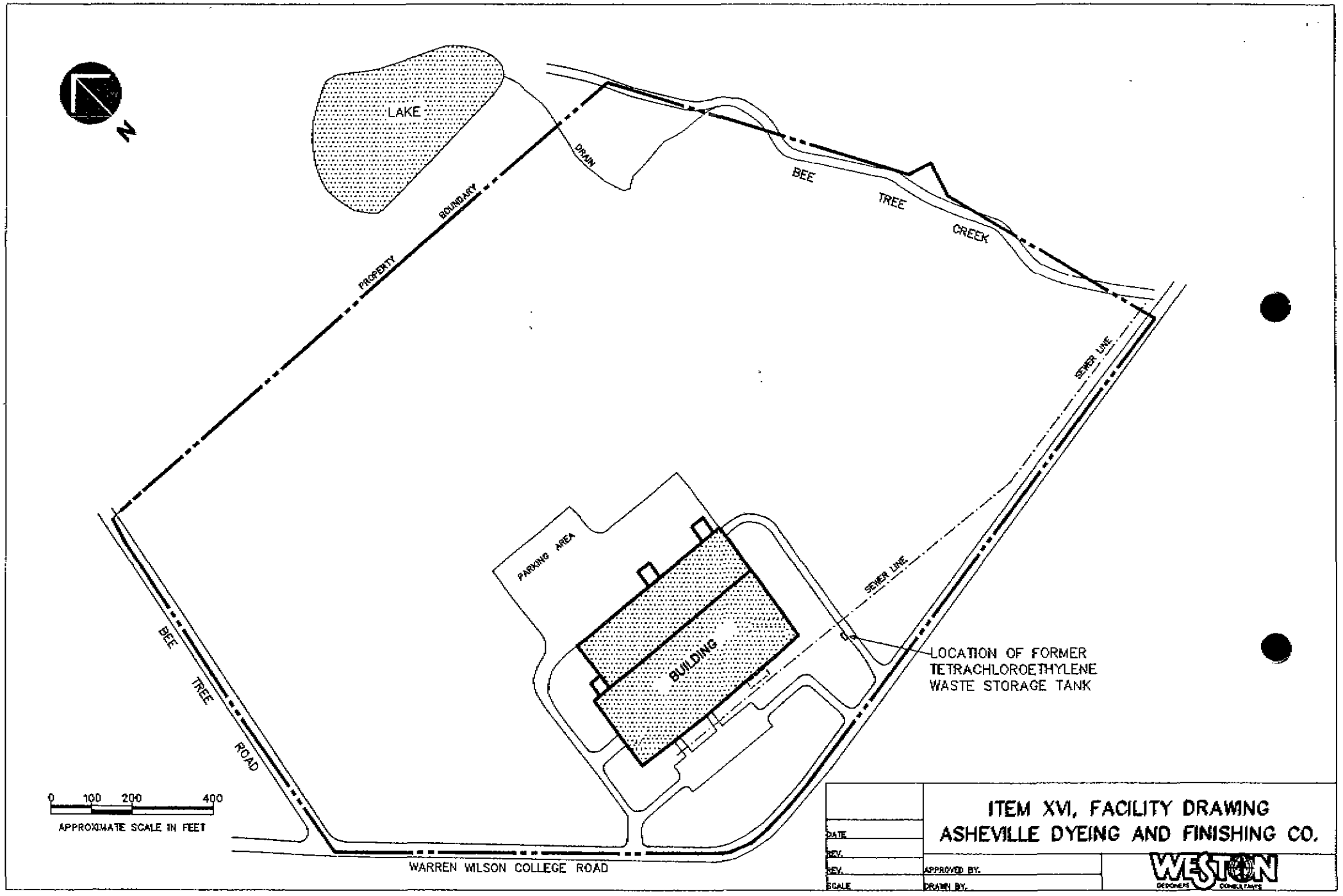
PL = PROPERTY LINE

SITE LOCATION N 82° 25' 56"
W 35° 36' 44"

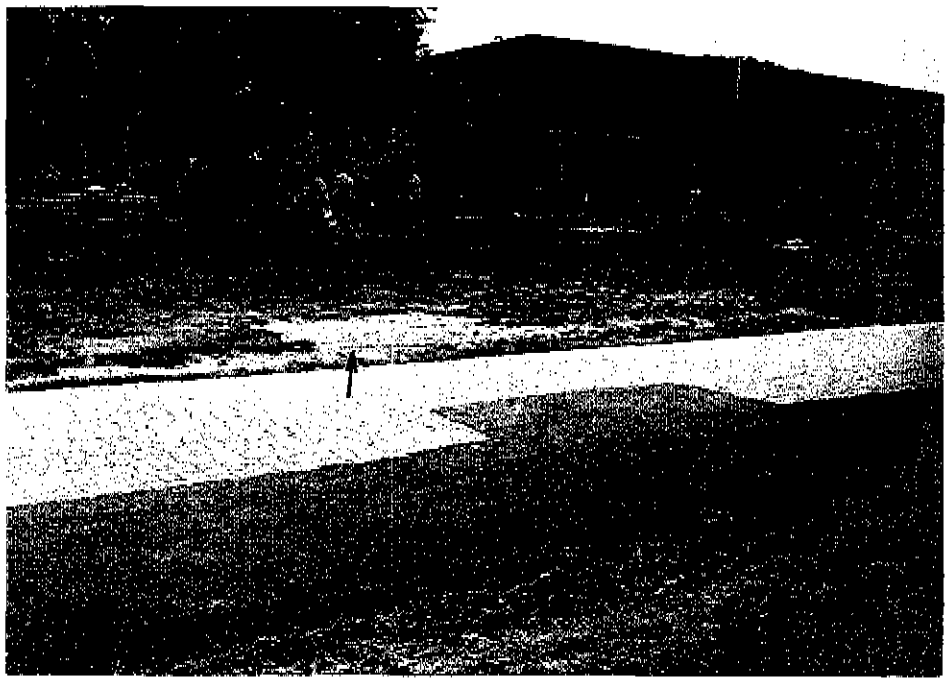
ITEM XV. MAP

WESTON

*SEE ATTACHMENT


N
LAKE
DRAIN
BEE TREE CREEK
PROPERTY BOUNDARY
SEWER LINE
SEWER LINE
PARKING AREA
BUILDING
LOCATION OF FORMER
TETRACHLOROETHYLENE
WASTE STORAGE TANK
BEE TREE ROAD
WARREN WILSON COLLEGE ROAD
0 100 200 400
APPROXIMATE SCALE IN FEET
ITEM XVI, FACILITY DRAWING
ASHEVILLE DYEING AND FINISHING CO.
DATE
REV.
REV.
SCALE
APPROVED BY:
DRAWN BY:
WESTON
DESIGNERS CONSULTANTS

ITEM XVII. PHOTOGRAPHS



SITE OF FORMER UNDERGROUND STORAGE TANK PIT
(D80 LANDFILL)
28 JUNE 1990